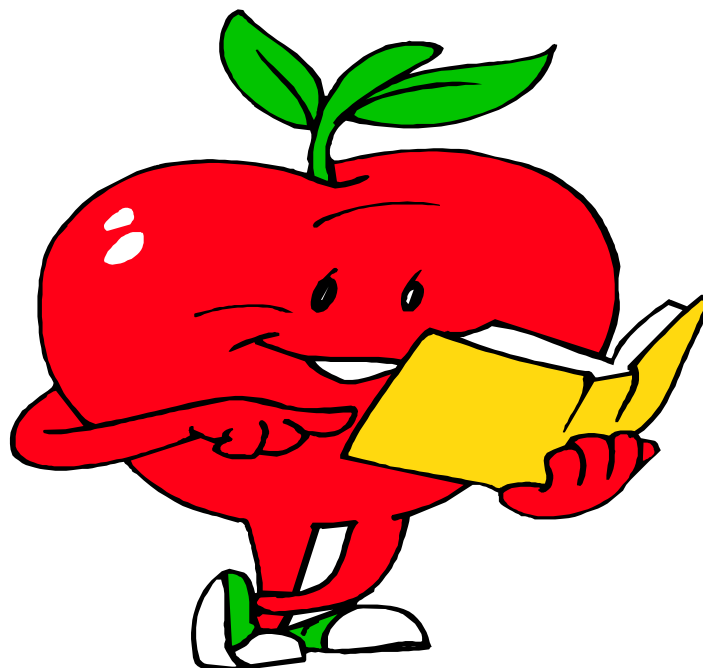


NUTRITION EDUCATION PLAN GUIDANCE

Fiscal Year 2001



Food and Nutrition Service
Food Stamp Program
Program Accountability Division
March 2000

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INTRODUCTION

The U.S. Department of Agriculture, Food and Nutrition Service (FNS), is committed to improving the nutrition health status of low-income Americans and to assisting in meeting the Healthy People 2010 nutrition and related objectives for the Nation.

FNS VISION STATEMENT

TO LEAD AMERICA IN ENDING HUNGER AND IMPROVING
NUTRITION AND HEALTH.

FNS MISSION STATEMENT

INCREASE FOOD SECURITY AND REDUCE HUNGER IN
PARTNERSHIP WITH COOPERATING ORGANIZATIONS BY
PROVIDING CHILDREN AND LOW-INCOME PEOPLE ACCESS TO
FOOD, A HEALTHFUL DIET, AND NUTRITION EDUCATION IN A
MANNER THAT SUPPORTS AMERICAN AGRICULTURE AND
INSPIRES PUBLIC CONFIDENCE.

FNS NUTRITION EDUCATION

FNS administers 15 nutrition assistance programs which touch the lives of one in six Americans each year, with potential to make a tremendous difference in the lives of children and low-income populations by promoting food security, reducing hunger, and improving nutrition status. These programs include:

- the Child Nutrition Programs, which provide meal service in school, day care and institutional settings,
- the Commodity Programs, which provide food commodities for use in the Child Nutrition Programs, congregate meals, and home distribution,
- the Special Supplemental Nutrition Program for Women, Infants and Children, which provides supplemental foods and nutrition education to pregnant and postpartum women, and young children, and
- The Food Stamp Program, the cornerstone FNS program which provides basic nutrition support to millions of low-income households.

FNS programs have been successful in increasing access of at-risk groups to nutritious foods. They also hold great potential to influence food choices and to support healthy eating and related nutrition behaviors. These programs represent extraordinary opportunities to reach participants with nutrition and healthy lifestyle messages, and to repeatedly reinforce those messages so that healthy behaviors are the ultimate result.

The Food Stamp Program is the cornerstone of the U.S. Department of Agriculture nutrition assistance programs. By combining nutrition education with food benefits, the Food Stamp nutrition education program plays a vital role in helping to improve the diets and food security of the Nation's low-income population.

FNS encourages States to submit a nutrition education plan for their Food Stamp program. This package provides guidance for food stamp nutrition education State plans for FY 2001. The new format of the guidance is intended to facilitate development of a clear, comprehensive State planning document.

The purpose of this guidance is to:

- assist State agencies with the preparation of their State nutrition education plan;
- describe reporting requirements for activities covered by the plan; and,
- clarify policy regarding allowable costs.

Diet has a significant impact on the health of Americans and is linked to the four leading causes of disease and premature death. Diet also plays a role in the development of other health conditions, which reduce the quality of life and productivity. These diet-related diseases cost society over \$70 billion each year. Recent reports indicate that nutrition education can lead to improved diets when behavior change is the focus and interventions are scientifically based.

FNS recognizes that, to be effective in changing behaviors, the investment in nutrition and nutrition education through the FNS programs must support long-term repeated exposure through multiple channels to reinforce behaviorally-focused messages that can reasonably compete in today's marketplace.

Behaviorally-focused nutrition education may be defined as *“any set of learning experiences designed to facilitate the voluntary adoption of eating and other nutrition related behaviors conducive to health and well-being... The behaviors to be addressed are identified from the needs, perceptions, motivations, and desires of the target audience, as well as from national nutrition and health goals and science-based research findings.”*¹

Examples of behaviorally-focused nutrition behaviors are those that are (a) related to food, for example, eating lower fat foods, adding one fruit each day, and switching to whole grain breads; (b) related to other nutritional issues, for example encouraging breast feeding practices, and encouraging safe food handling; or (c) relating to the environmental impact of dietary practices.

Examples of behavioral change strategies are activities that:

¹ Journal of Nutrition Education, Volume 27, Number 6, November-December, 1995, page 279.

- encourage participants to conduct nutrition self-assessments,
- teach effective behaviors for healthful eating,
- help children and adults choose among alternatives,
- teach experiences with new foods,
- encourage goal and objective setting, teach accordingly, and monitor progress to achieve the individual goals and objectives, and
- provide incentives and reinforcements.

To meet FNS' goal to deliver behaviorally-focused nutrition education, we must magnify our efforts through effective partnerships and consistent messages.

FOOD STAMP NUTRITION EDUCATION

Goal

The goal of Nutrition Education in the Food Stamp Program is to provide educational programs that increase, within a limited budget, the likelihood of all food stamp recipients making healthy food choices consistent with the most recent dietary advice as reflected in the Dietary Guidelines for Americans and the Food Guide Pyramid.

Objectives

- To insure that individuals and families have enough to eat without resorting to emergency food assistance. (Food Security)
- To improve households' safe handling, preparation and storage of food. (Food Safety)
- To enhance practices related to thrifty shopping for and preparation of nutritious foods. (Shopping Behavior/Food Resource Management)
- To motivate consumers to adopt eating and lifestyle behaviors that are consistent with the Dietary Guidelines for Americans and the Food Guide Pyramid. (Dietary Quality)
- To bring change to the system or environment that makes nutritious diets more available to food stamp households, such as a new food outlet. (System and Environmental Change)
- To communicate science-based, behaviorally-focused nutrition and lifestyle messages to a large diverse population, using state of the art techniques such as social marketing.

NUTRITION EDUCATION PLAN

Submitting the Nutrition Education Plan

Under current Food Stamp regulations at 7 CFR 272.2(d), States agencies have the option to develop nutrition education plans. States agencies seeking federal funding to implement or to continue operating a Food Stamp Nutrition Education Program must submit a plan to FNS for approval.

As specified under 7 CFR 272.2(e) of the regulations, the Food Stamp Program Nutrition Education Plan must be signed by the head of the State agency and must be submitted to the FNS Regional Office annually no later than August 15 for the coming Federal fiscal year, which begins October 1. The nutrition education plan may be submitted before August 15, if State budget cycles require a commitment before the beginning of the Federal fiscal year. State agencies may submit multi-year plans with the understanding that 1) any changes in planned activities must be approved as an amendment to the plan annually and 2) approval of budgets for planned activities is on an annual basis.

Food and Nutrition Service regional office financial management and program staff are available to provide technical and other assistance in support of the State agencies developing nutrition education plans.

Describing the Food Stamp Nutrition Education Program

The Food Stamp Nutrition Education Program covers activities that are designed with the purpose of motivating, within a limited budget, healthy eating and lifestyle behaviors by all food stamp recipients that are consistent with the most recent dietary advice as reflected in the Dietary Guidelines for Americans and the Food Guide Pyramid.

The following guidance will lead the writer in detail through the requirements of a State plan document. However, the following provides an overview of the essential elements of the plan:

The nutrition education plan must include:

- report of Prior Year's Nutrition Education Activities
- a narrative description of the methodology for conducting needs assessment in the target audience. If such data exist, findings and conclusions of the assessment should be reported and included in the plan;
- the goals, objectives and the educational strategies or methods to be used and the time-frame for achieving the goals and objectives;
- a description of the proposed nutrition education activities for the coming year and the methods to be used to achieve them;
- a description of the methodology to be used for conducting process and outcome evaluations and a discussion of the performance measures;
- the time frames, staffing, and budget plans; and
- a description of how the agency will coordinate nutrition education efforts under this program with other public and private agencies, including but not limited to those agencies in the State that administer FNS programs (e.g., WIC, Team Nutrition).

Partnerships

FNS believes that the effectiveness of nutrition education can be greatly enhanced through collaboration with others interested in promoting health and nutrition in low-income populations. Therefore, FNS strongly encourages collaboration and coordination of efforts with statewide public and private partners to enhance both the reach and efficacy of the nutrition education efforts. At a minimum, the plan should describe how the Food Stamp agency will collaborate and coordinate with other State agencies that administer FNS programs, such as State education, agriculture, and health agencies. FNS encourages such collaboration to facilitate development of long-term, coordinated nutrition education plans and sustainable infrastructures, foster an integrated approach to nutrition education across programs in the State, capitalize on promotional opportunities, coordinate and pool resources for material development, duplication, and dissemination, and ensure development of science-based messages that are consistent with the U.S.

Dietary Guidelines for Americans, the Food Guide Pyramid, and other federal guidance.

Messages

To create a base of messages that may be reinforced across FNS programs, FNS has identified four key messages that should be a basic component of nutrition education delivered to FNS program recipients. FNS encourages use of these messages as a core component of nutrition education in all nutrition assistance programs. These messages—derived directly from federal dietary guidelines—are being consistently and prominently promoted in all of the FNS programs that deliver not only direct food assistance, but also nutrition education. For example, Team Nutrition, an integrated, behavior-based, comprehensive plan for promoting the nutrition and health of the Nation's school children, promotes these four consistent messages to children across the nation. Thus, program administrators across the many FNS programs can use these messages with the knowledge that they are being reinforced in other FNS nutrition assistance programs that deliver nutrition education to clients. The messages, all designed to promote food and physical activity choices for a healthy lifestyle, are as follows:

Eat a variety of foods

Add more fruits, vegetables and whole grains

Eat lower fat foods more often

Be physically active

It is expected that nutrition education messages will logically be tailored to address the most urgent nutrition education needs of constituents. However, as opportunities arise, FNS strongly encourages State agencies to convey these four messages through the Food Stamp and other FNS programs so that program recipients have repeated exposure to these messages.

Nutrition Education Elements

To formulate the goals/objectives and determine the effectiveness of your nutrition education program, FNS encourages States to focus on the following elements:

- Food Security
- Food Safety
- Dietary Quality
- Food Resource Management/Shopping Behaviors
- System and Environmental Changes

The following is a brief explanation of the five core elements:

Food Security

Applies to the general well-being of a food stamp household in terms of always having enough to eat without having to seek emergency food, such as from food/pantries, to tide the household over through the end of the month. A food secure household has assured access at all times to enough food for an active, healthy life, including the ready availability of nutritionally adequate, safe foods and the assured ability to acquire acceptable foods in socially acceptable ways. In measuring the food security status of households, "Food Secure" is at one end of the scale and "Hunger"(or severe food insecurity) is at the other.

Food Safety

Applies to how food is handled. Specifically, it deals with issues such as hand-washing, length of time food is left without refrigeration, the temperature at which food is stored, and whether food is properly cooked.

Shopping Behavior/Food Resource Management

Applies to the practices related to thrifty shopping for nutritious foods. These include practices related to how and where food is acquired, how often food is purchased, and the types of food purchased. These also include such skills as making shopping lists, reading labels for nutritional values, and menu planning.

Dietary Quality

Applies to the nutritional value of food acquired, and how well the overall diet of the food stamp participant compares to recommended guidelines such as the Food Guide Pyramid and Dietary Guidelines for Americans (e.g., increasing to recommended levels the consumption of fruits and vegetables and grains and decreasing consumption of fat).

System and Environmental Change

Applies to changes in the system or the environment that can enable or facilitate the availability of nutritious diets to FSP participants. For example, several State food stamp nutrition education plans are working to encourage FSP participants to use food stamps to purchase fresh produce in farmers markets. Other initiatives include working to increase the availability of neighborhood retail food outlets, and training day care providers serving children from families with limited resources.

FOOD STAMP PROGRAM

Fiscal Year 2001

ANNUAL PLAN FOR NUTRITION EDUCATION

FOR

STATE AGENCY_____

FISCAL YEAR_____

DATE_____/_____/_____

STATE PLAN GUIDANCE

PART I. REPORT OF PRIOR YEAR'S NUTRITION EDUCATION ACTIVITIES

Summarize the nutrition education activities specified in your prior year's plan and report your progress in improving nutrition and lifestyle behaviors of program participants. Be sure to include a description of the following:

- implementation of planned activities (evaluation of the process);
- accomplishments in achieving objectives. If certain objectives were not achieved, or not fully achieved, specify why;
- Positive aspects of the program that contributed to accomplishing the objectives as well as barriers encountered;
- total number of persons reached;
- effectiveness in increasing the number of participants attending nutrition education activities;
- behavior outcomes using performance measures, such as increase in consumption of breakfast, increase in fruit and vegetable consumption, or improvement in safe food handling;
- how nutrition education was delivered to persons with special language, ethnic, or cultural needs;
- what worked well and what did not work well, in terms of materials, methods, and educational approaches;
- report of expenditures plan and actual expenditure on nutrition education during the prior year;
- explanation of expenditure greater than 10 percent of the approved expenditure plan, with a breakdown of expenditure by sub-contractor, and a list of materials or interventions developed with additional funding.

In addition,

- List and provide a copy or description of the nutrition strategies, tools, and materials developed in the past year by the food stamp nutrition education program; and
- List and provide a copy or description of the nutrition strategies, tools, and materials developed or conducted in languages other than English.

PART II. CURRENT YEAR'S NUTRITION EDUCATION PLAN

Section A NEEDS ASSESSMENT OF TARGET POPULATION (FOR UPCOMING YEAR)

- A. Provide an overview and description of the food stamp population you will serve. For example: number of working households, composition of households, and segment of population targeted for food stamp nutrition education.
- B. Describe the needs assessment procedure you plan to conduct to learn about the audience.
- C. If data are already available, describe the nutrition issues of greatest concern to your Food Stamp participants. Which topics are participants less knowledgeable about? Which behaviors did they report needing improvement?

Section B GOALS AND OBJECTIVES (FOR UPCOMING YEAR)

List the behavioral and motivational objectives targeted by your nutrition education plan, as well as the educational strategies and vehicles that you will employ to achieve them. Describe the following: (See work plan Appendix A, Attachment 1/use of attachment formats provided is optional)

- Educational objectives: cognitive, affective, and behavioral. Examples of objectives include:
 - A. Using the Nutrition Facts Label, participants will identify the fat content of different food items (cognitive).
 - B. After participating in a session about food safety, learners will be motivated to learn more about sanitation (affective).
 - C. As a result of attending a 5-A-Day lesson, participants will consume one additional serving of vegetables per day (behavioral).
- Describe the methods, strategies, **and tools** that will be used to achieve the objectives such as:
- Plans for reaching the target population

- Social marketing strategies for development, and dissemination of educational interventions
- Educational resources and/or materials to be used for each objective:
 - Identify education materials that will be developed by the Nutrition Education Program. Examples include:
 - Informational materials used (e.g., brochures, videos, self-instructional lessons)
 - A. Specific visual aids including posters and displays
 - B. Videos
 - C. Public Service Announcements (PSAs), i.e., TV, radio, or print advertisements
 - D. Computer programs and tools, such as CD-ROMs, interactive games
 - E. Billboards
 - F. Newsletters
 - G. Recipe cards/books
 - H. Cooking classes (cooking, tasting, demonstrations, etc.)
 - I. Toll-free nutrition education lines
 - J. Workshops
 - K. Interactive discussion
 - Identify those materials in languages other than English.
- Describe nutrition education curricula being used. This includes non-academic curricula such as those from the Expanded Food and Nutrition Program. (EFNEP)
- The time frame for accomplishment of objectives
- The performance measures or indicators of expected outcome, for example, change in behavior or improvement in cooking skills.

Section C. STAFFING (FOR UPCOMING YEAR)

Provide the following summary on all staff that have been included in the coming fiscal year's budget that will carry out food stamp

nutrition education functions. (Appendix A, Attachment 2, use of attachment formats provided is optional)

- Position Title
- Summary of Duties or Generic Position Description
- Salary
- ADA member/RD status
- Percent of time used for Food Stamp Nutrition Education

Section D. BUDGET SUMMARY

State Approved Waivers

List waivers (by number and type) that have been approved for FY 2001 nutrition education plan.

Contracted Nutrition Education

If the State agency intends to contract for food stamp nutrition education with sub-grantees and coordinate with other allied organizations or cooperatives for provision of any food stamp nutrition education services to food stamp recipients, list all current services of **Federal** grants, cooperative agreements or contracts related to the Food Stamp Program for nutrition education. Include the following for all costs: (Appendix A, Attachment 3 optional).

- Funding Source
- Description of Services
- Cost Amount
- Duration of Funding

Budget Information

For each nutrition education project:

- Identify the full-time equivalent (FTE) and position of staff that will be conducting food stamp nutrition education.
- Attach copy of any interagency agreement(s) that identifies how the federal funds will be shared between the State or county agency and/or other agencies. If the State agency subcontracts with another agency or organization to accomplish nutrition education activities, the State

agency is responsible for the accuracy of reimbursement claims submitted by the subcontractor/grantees. In your plan, you will need to submit a list of all sub-grants and amount of funding for each grant.

- Summarize the State and Federal cost for each planned nutrition education project. Provide a detailed breakdown that includes at minimum the information contained in attachments 4 and 5. You may use Appendix A, Attachment 4 (optional), or another format for providing this information. Include total cost for nutrition education. (Appendix A, Attachment 5 (optional)).

Section E. OUTCOME EVALUATION OF NUTRITION EDUCATION PROGRAM

- Provide a specific evaluation plan for your upcoming year's nutrition education plan. States must have an evaluation plan in place effective October 1.
- Describe how you will measure your accomplishments in achieving the nutrition education goals and key objectives.
- Discuss process and/or evaluation findings such as:
 - A. number of people reached;
 - B. number in attendance;
 - C. number of materials disseminated;
 - D. did program/event result in increased awareness in knowledge; consumption; and change in behavior?

VII. ASSURANCES

To assure compliance with policies described elsewhere in this guidance, the Food Stamp Program Nutrition Education Plan must include the following assurances that:

- Nutrition Education activities are conducted exclusively for the benefit of Food Stamp Program applicants and participants. While the nutrition education activities are conducted for the benefit of FSP recipients, they may also benefit others as long as an approved waiver is granted and the primary beneficiaries are FSP clients.
- Approved Food Stamp Nutrition Education activities funded by the state agency through the Expanded Food and Nutrition Education Program (EFNEP) are designed to expand the State's current EFNEP in order to serve additional food stamp recipients or to provide additional educational services to EFNEP clients who are food stamp recipients.
- Donations from other non-Federal public agencies to the Food Stamp Nutrition Education Program have not been claimed or used as a match or reimbursement under any other Federal program.
- Documentation of State costs, payments and donations for approved Food Stamp Nutrition education activities will be maintained by the State and will be available for USDA audit.
- Contracts will be procured through competitive bid procedures governed by State procurement regulations.

APPENDIX A

Suggested Formats for Attachments

Attachment 1

Annual Nutrition Education Work Plan				
Objective(S)	Method to be Used	Educational Resources and/or Materials	Time Frame	Performance

Attachment 2

USDA-Food Stamp Program Nutrition Education		
Staffing Identification Chart		
Identify and provide the following summary information on Food Stamp Nutrition Education		
Position	Summary of Duties Or Generic Position Description	Salary

Attachment 3

USDA-Food Stamp Program Nutrition Education			
Budget Summary			
Fiscal Year _____			
Funding Source	Description of Services	Cost Amount	Duration of Funding

Attachment 4

USDA-Food Stamp Program Nutrition Education			
Budget Summary Expenses			
Expenses	State Cont. (a)	Public Non-Fed. (b)	Total State (a) (b)
Project:			
Salary/Benefits			
Contracts/Grants/Agreement			
Non-Capital Equipment Supplies			
Materials			
Travel			
Administrative			
Building/Space			
Maintenance			
Equipment & other Capital Expenditures			
Indirect Cost			
Total Cost			

Attachment 5

USDA-Food Stamp Program Nutrition Education		
Budget Summary		
Project	State Cost	Federal Cost
Total Cost (State and Federal)	(a)	(b)

Total Cost: [(A)+(B)]=Total Nutrition Education Costs

APPENDIX B

REPORTING REQUIREMENTS

In addition to submitting the nutrition education plan, State agencies must submit FNS-366A, Budget Projection Statement, for FNS approval. State agencies must report their projected requested Federal funding for nutrition education on FNS Form FNS 366A, line 17, Nutrition Education. This statement is due August 15th in the FNS Regional office for the upcoming Federal fiscal year.

The State agency must report nutrition education expenditures, in Column 17-Nutrition Education- on FNS Form SF-269. This report is to be submitted quarterly, 30 days after the end of each quarter.

APPENDIX C

COST POLICY

The following sections identify the costs that can be approved for Federal reimbursement under an approved Food Stamp Nutrition Education Plan.

Under Section 16 of the Food Stamp Act of 1977, as amended, a State food stamp agency is reimbursed 50 percent for allowable administrative program costs that are reasonable and necessary to operate approved nutrition education activities. Because State costs, by law, are reimbursed, the Food Stamp Nutrition Education Program is not a “grant” program, which provides a set level of funding for specific activities for a specific period of time. While plan activities are approved on an annual basis, allowable costs may be reimbursed in the subsequent year if the activity overlaps fiscal years or if payment for services delivered during the fiscal year was delayed. Nutrition education project obligations must be established in the fiscal year the funds are appropriated but disbursements against these obligations may occur after the fiscal year closes. Allowable costs are specified under OMB Circular A-87, Departmental rules at 7 CFR 3015 and Food Stamp Program rules at 7 CFR Part 277.

If state agencies determine that actual expenditure will exceed planned expenditure by 10 percent or more, advance Federal approval is required to ensure that costs are reasonable and necessary.

Federal reimbursement is subject to the availability of Federal funds. This statement will be included in all plan approval letters.

A. Allowable Program and Administrative Expenses

Allowable costs for operating the Food Stamp Nutrition Education Program include program and administrative expenses that are reasonable and necessary to operate approved nutrition education activities.

Program expenses include:

- salaries and benefits of personnel involved food stamp nutrition education;
- office equipment, supplies, postage, duplication costs and travel that is necessary to carry out the project's objectives;
- development and production of food stamp educational materials.

Administrative Expenses-expenses that support the administrative activities;

- salaries and benefits of personnel providing administrative support;
- lease or rental costs;
- maintenance expenses; and
- other indirect costs

Time records must support salaries of employees chargeable to more than one program or activity. The State must maintain a time record system which can be audited and which accounts for all employee time worked on each project.

A.1 Property Procurement and Management

The State agency must receive prior Federal approval before procuring or requesting reimbursement for equipment valued at more than \$5,000, per item, or in the aggregate. Review and approval of equipment acquisition is normally conducted during review of the proposed budget. Budget review should ensure that proposed equipment requests do not duplicate previous year's equipment purchases for the same project. Inventory records must be maintained for equipment that is paid for in full, or in part, with Federal funds. A physical inventory is required every two years.

A.2 Indirect Cost Rate

Indirect cost computation is based on policy prescribed by the Office of Management and Budget (OMB). The intent of the OMB policy is to ensure that the Federal Government bears its fair share of costs in accordance with generally accepted accounting principles.

Indirect costs are defined as those that benefit more than one program but are not easily identified to a specific program. The

general rule is that if a cost can be readily attributed to a specific program it should be classified as a direct cost rather than be included in the indirect cost pool.

One basic computation method is to 1) identify all the costs that are considered indirect costs because they serve several programs (e.g., payroll, computer center, personnel) 2) total indirect costs 3) identify all the programs that are served by indirect costs 4) total the direct costs of all the programs served. Divide total indirect costs by total direct costs, which results in an "Indirect Cost Rate." This rate is then applied to the direct costs of each program (in this case nutrition education) and the result is charged to the program as its "indirect cost."

The cost of determining an indirect cost rate should not present any undue financial or other burden for State or local agencies. State agencies and large local agencies normally have permanent financial staff who, along with other assigned duties are responsible for developing indirect cost rates. Small local agencies may not have staff with such expertise. They should, however, be able to go to their State agency for assistance or obtain contracted accounting services as an allowable program cost. Any costs of determining the indirect costs are themselves allowable costs that are included as either direct or indirect costs.

State agencies are responsible for ensuring that indirect costs included as part of the State Food Stamp Nutrition Education Plans are supported by an indirect cost agreement approved by the appropriate cognizant agency and are claimed in accordance with that agreement. FNS may request documentation in support of an indirect cost rate. See definitions in Appendix D for more information on "cognizant agency".

A.3 Waiver

- *Exclusivity Clause Waivers.* Federal food stamp regulation on the content of Nutrition Education Plan requires states to provide "assurance" that nutrition education programs "are conducted

exclusively for the benefit of Food Stamp Program applicants and participants” [7CFR 272.2(d)(2)(iii)]. However, State agencies may pursue waivers to allow activities that also affect other individuals that are not currently participating. The waiver request should document that activities will be targeted to low-income households who are potentially eligible for the Food Stamp Program. For example, States will have to demonstrate that the nutrition education activity is provided in a demographic area containing a high proportion of low-income households or a school district serving a majority of children free and reduced price meals.

- *Use of Private Donations Waivers.* Federal regulations prohibit the use of private donations as state contribution toward federal food stamp matching dollars. [7CFR277.4 (c) &(d)]. In approving waivers for private cash donations, FNS has several conditions that States must meet. These include:
 - A. a provision requiring that no endorsements of donors or products will be given in connection with the nutrition education activities.
 - B. a provision requiring that no funds will revert back to donor.

These conditions on the use of private cash donations, even when waivers are granted, are to be included in the state's waiver and Nutrition Education Plan. States need to consider these as they seek private cash and in-kind donations.

A.4 Donations from Non-Federal Public Agencies

As specified under 7 CFR 277.5(c), Federal reimbursement for the costs of services or property donated by other non-Federal public (i.e., government) agencies is allowable provided that the donated costs are not billed or claimed to another Federal program. The state agency must maintain records or an audit trail, which identifies how program funds are billed and the records, for audit.

A.5 Non-Federal Public Agencies

A non-federal public agency is an organization of State government that is supported by funds derived from general tax revenues (receipts) of a State or locality specifically allocated from appropriate budgetary authority such as a State legislature, county or local government. This would include, for example, State or local government financed educational institutions and State funded hospitals. The Department's Office of General Counsel (OGC) has reviewed whether the term "non-Federal public agencies", as used in 7 CFR 277.4(c) can be interpreted to include "marketing orders, councils and commissions".

OGC concluded that marketing orders, councils, and commissions may be included within the term, "non federal public agency" for the purposes of using the donation as part of State cost for Federal matching funds depending on the source from which they derived the budgetary authority and the activity in which they are engaged. To be included as State cost, the budgetary authority must be delegated through some act of the State legislature or by a branch of State government and the activities in which the entity engage must be governmental in nature. The activities must affect the right of private parties through adjudication, rule making, investigating, prosecuting, negotiating, settling, or informally acting. Membership assessments should be relatively equal among the various members.

The State agency must describe in the plan the source of the entity's regulatory authority and the nature of the activities in which the entity is engaged. The State agency must also describe the relationship of the entity to the objectives of the proposed nutrition education activity. Funding provided by the marketing order should be used to support objectives of the nutrition education activity benefiting the food stamp households. Marketing orders funding for food stamp nutrition education should not be used to promote single-commodity nutrition education messages to the exclusion of the overall nutrition education objectives.

A.6 Medical Equipment

FNS has determined, based on OMB Circular A-87, that medical equipment or health services related to health assessments of recipients, obtaining data on nutritional status, chronic disease or chronic disease risk assessments are not a necessary and reasonable cost to provide nutrition education in the FSP. Therefore, they are not allowable costs. In addition, measurement of height, weight, skinfold thickness, blood pressure, cholesterol, blood glucose and iron levels are not allowable costs. However, salaries and benefits of personnel to assess biochemical data provided by recipients or to collect dietary intake data questionnaires on nutrition knowledge and behaviors are allowable costs.

A.7 Gardening

FNS believes that gardening is a beneficial project that leads to the production and consumption of healthy and fresh food. However, the provisions of OMB Circular A-87 allow USDA/FNS to make a reasonable judgment as to what is necessary and reasonable to deliver nutrition education. The cost for the rental or purchase of garden equipment (fertilizer, tractors), the purchase or rental of land for garden plots and the activity of gardening itself are not allowable food stamp nutrition education costs. However, educational supplies and curricula to teach gardening concepts that reinforce the beneficial aspects of gardening are allowable costs.

A.8 Valuation of Publicly Owned Space

Federal requirements regarding the valuation of publicly owned space is contained in Office of Management and Budget (OMB) Circulars A-21 and A-110 and Departmental regulations at 7 CFR 3015 and indicate that in no case may publicly owned space be "donated" or billed at fair market rental rates. The only method allowable for calculating reimbursement of publicly owned space is depreciation or use allowance. Fair market rates may not be used for publicly owned space regardless of whether they are direct billed or donated. The

cost of space owned by a public agency is the acquisition cost of that space, plus maintenance and utilities (FNS Policy memorandum-March 9, 1998). See an example of this calculation at the end of guidance document under definitions.

A.9 Time Records

States preparing Food Stamp Nutrition Education Plans should review staff allocation time records for activities eligible for reimbursement. Budget sections of State plans should confirm that time records are documented weekly for nutrition education staff devoting less than 100 percent of their time to the project. Grantees who have federally approved Random Moments Time Studies need not use time records to document time spent on allowable activities. Grantees may submit alternative methods of calculating with appropriate justification for consideration by the FNS regional office. Time records need not be submitted with the plan but should be maintained by the project for audit. (FNS Policy Memorandum-April 1998)

A.10 Membership, Subscription, and Professional Activity Cost

Cost of institution memberships in business, technical, and professional organizations are allowable. These memberships, subscriptions, and professional activity costs should be consistent with the effort to promote the provision of quality nutrition services to Food Stamp participants. Costs of institutional memberships for nutrition personnel that work directly with the Food Stamp nutrition education project are reimbursable. The cost to the institution should be prorated according to the percentage of time actually spent by the employee in performing nutrition education activities for the food stamp project. Professional registration or license fees paid by individuals would not be allowable costs since the fees would be considered personal expenses, not institutional expenses.

B. Sources of State Share Program Cost

B.1 Private, Third-Party, In-kind Donations

The Food Stamp Nutrition Education Program is a reimbursable program. The Food Stamp State plan is approved for a specified level of funding. The Federal Government reimburses the State for a portion (50 percent) of allowable costs incurred. The Federal Government is not authorized to reimburse a State agency for the value of private, third party, in-kind donations, including volunteer services because the State agency receiving the donation does not expend any funds (outlay) to reimburse.

As specified under 7 CFR 277.4(e), the value of services rendered by volunteers or the value of goods (i.e., in-kind) donated by private, third parties are not allowable for reimbursement purposes under the FSP. However, State agencies are not prohibited from accepting private, third party, and in-kind donations.

B.2 Private, Third-Party, Cash Donations

The State agency may request a waiver to allow private cash donations that are contributed to the State agency, or are contributed to a non-Federal public agency to support the Food Stamp Nutrition Education Program, provided that the private, third-party, cash donations meet the criteria, as specified under 7 CFR 277.4(d) of the Food Stamp Program regulations. Approved waivers may include additional conditions.

B.3 Determining Allowable Cost

USDA's Uniform Federal Assistance Regulations, at 7 CFR Part 3015, Cost Principles, state, in part, that Federal funds received by a State or local government entity can not be used to determine allowable costs under another federally funded activity, "unless specifically authorized by Federal statute". Certain Federal legislation supporting funding to Indian Tribal Organizations (ITO) contains "other Federal laws notwithstanding" language which allows tribal governing bodies to use Federal funds as matching to receive other Federal funds. An ITO that chooses to submit a nutrition education plan for inclusion in the State plan can use Federal funds as a local source of matching to request reimbursement for food stamp administrative funds. In such

circumstances the State agency need only provide assurance that the source of local matching funds is a federal grant containing the “notwithstanding” language and a copy of the grant agreement between the ITO and the Federal agency is available for review.

C. Other Miscellaneous Issues

C.1 Federal Royalty Rights

The Food and Nutrition Service reserves a royalty-free, non-exclusive right to reproduce, publish, use or authorize others to use videos, computer programs such CD-ROM and related source codes, literature, or other products produced with Food Stamp Program funds for government purposes. The State and local agencies may sell videos or literature to other States for Food Stamp nutrition education purposes at the cost of reproduction, plus shipping and handling. If a State realizes a profit from sale, it must report the amount to FNS as profit income.

C.2 Case File Information

The Expanded Food and Nutrition Education Program (EFNEP), administered by the Department's Cooperative Extension Service pursuant to Section 11(f) of the Food Stamp Act of 1977, as amended (the Act), satisfies the exception in Section 11(e)(8) of the Act regarding disclosure of information obtained from applicant households to among others, persons directly connected with the administration of federally assisted State programs. The Cooperative Extension Service's program is a federally assisted program and as such, upon request to the State agency administering the Food Stamp Program, may be provided information received from applicant households. Information released may only be used by a State's EFNEP agency to assist in delivering nutrition education training to food stamp applicant and participant households. The following provides examples of allowable and unallowable costs.

EXAMPLES OF ALLOWABLE COSTS

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
Literature	
Fact sheets, brochures, newsletters, etc., that are produced for distribution to food stamp recipients about nutrition education related topics such as food choices, food budgeting and food preparation. Costs for nutrition education material may be shared between programs provided the State agency describes the interagency agreement that exists between the programs, and the method used for allocating costs between the programs.	Any nutrition education literature paid in full by another federal or private program or source for its use. Any material that endorses or promotes brand name products or retail stores. Manufacturer's or store (cents off) coupons.
Audiovisuals	
Videos targeted to food stamp applicants and recipients about nutrition education related topics.	Any audiovisual paid-in-full by another program or source and any audiovisual that endorses or promotes brand name products or retail stores.
Media Campaigns	
Local radio and television announcements of nutrition education events for food stamp applicants and participants. Media announcements promoting nutrition messages that are directed toward low-income households within the community.	Media campaigns to promote or present nutrition messages to the general public which are not targeted to low-income or to the food stamp eligible population within the community.
Electronic Equipment	
Purchase of electronic equipment for processing videos.	Equipment that exceeds prior approval thresholds (i.e., \$5,000) unless such prior approval is received from FNS (e.g., CD-ROM purchases).
Food Demonstration	
Cost of food for recipe/taste testing purposes and cost of kitchen equipment and dishes necessary for food storage, preparation and display of food prepared for demonstration purposes.	Distribution of food items given for attendance. Also, incentive payments to encourage attendance at nutrition education classes or focus groups.

EXAMPLES OF ALLOWABLE COSTS

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
Nutrition Education Classes	
<p>Classroom setting (salaries, space, equipment, materials) for food stamp recipients on nutrition related topics (e.g., food budgeting, preparation, safety). Primary purpose of class must be to provide nutrition education or, if nutrition education is included with other topics, only that portion of class pertaining to nutrition education is an allowable cost. For example, the Dietary Guideline to "Balance the food you eat with physical activity..." as a class component is allowable but, physical fitness in terms of exercise classes would not be allowable.</p> <p>Classes that are provided to food stamp recipients in conjunction with another program (e.g., WIC), provided the State agency describes the interagency agreement that exists between the programs, and the method for allocating costs between the programs.</p>	<p>Classes that are designed to provide case management or "life skills" training (e.g., parenting, child development, EITC, crisis mgt., rental information). Only that portion of the training related to nutrition education would be allowable.</p> <p>Nutrition education classes that are charged to another Federal program (e.g., WIC, EFNEP).</p>
Space Allocation	
Space allocated between programs in which the plan for the space/cost allocation between programs is documented and the costs are tracked.	In-kind charges for space that is donated by a private third-party or costs that are fully funded by another program (e.g., USDA WIC and EFNEP programs).
Other Costs	
<p>Training for staff related to providing nutrition education to food stamp applicants/recipients.</p> <p>General briefings to community health care providers about FSP nutrition education in the community.</p> <p>Conducting focus groups as an essential part of developing and testing targeted nutrition messages for food stamp applicants and participants. Expenses (e.g., meals, childcare, transportation) that are considered necessary and reasonable for services provided as a focus group participant.</p>	<p>Costs of recipients to attend nutrition education activities (e.g., child care, transportation services).</p> <p>Incentive payments, either to attend nutrition education classes, or to provide feedback on nutrition materials (focus groups).</p>

APPENDIX D

Definitions

These definitions are for clarification of terms that maybe used throughout the guidance.

Activity refers to actual work performed by program personnel to implement objectives.

Behavior indicates action rather than knowledge or attitudes.

Budget Projection, FNS-366A is a budget report submitted by State agencies to FNS to request the amount of annual funds needed to operate the FSP. It is the form used to support the annual funding request. Any need for additional funds requires a revised 366A.

Effectiveness is the extent to which to pre-established objectives are attained as a result of program activity, as indicated by performance measures.

Example of Calculating Valuation of Publicly Own Space-Only the depreciation or use allowance method may be used to charge FNS for use of publicly owned space. Depreciation is dividing the cost of the building over its useful life. For example, if a building cost \$50,000 to build and it had a useful life of 20 years, the yearly depreciation would be \$2500. This cost is spread over the square footage of the building, resulting in an annual rate per square foot. FSP share would be the amount of space that is used for the FSP. A use allowance is used when the building is fully depreciated. You are allowed to charge no more than 2 percent of the cost of the building per year. In the example above, States could only charge \$1000 per year.

Financial Status Report, SF-269 is a report submitted by State agencies to FNS to report the amount of expenditures for FSP administration.

Marketing Orders generally refer to USDA or State programs that support prices and consumption of various fruits, vegetables, milk, eggs and meat programs. Funds are collected from the producers and used to publicize the item in question. Limits to production are also enforced. (For example both Florida and California have orange marketing order boards). With some constraints, money and services provided by marketing boards can compromise an allowable component of a State Plan. However, the promotion of a specific item (for example, only oranges) is not an allowable expense.

Needs Assessment is the process of identifying and describing the extent and type of health and nutrition problems and needs determined among individuals and /or target populations in the community. Focus groups, interviews, and short surveys are usually used to assess the needs of the target audience, as well as pre-established data from survey research conducted with the target population.

Non-Federal Public Agency is a State or local government agency or entity, including state universities and colleges, and instrumentality's of the state, such as, organizations that are chartered by state or local governments for public purpose.

Nutrition Education Plan is an official written document, which describes the nutrition education services to be provided to Food Stamp recipients. It should clearly describe goals, priorities, objectives, activities, procedures used, and resources including staff and budget, and evaluation method.

Random Moment Time Studies are time studies conducted through the use of a sampling methodology rather than through a log of each time period worked by the employee. The studies are used to determine the percentage of time worked by activity or program. The purpose of the study is to allocate the cost of time worked among the various activities.

Social Marketing

Social marketing is an audience-centered approach that features multiple and reinforcing channels of communication that along with public policy and environmental changes seek to influence behavior. Although social marketing efforts often make use of television, radio ads, videos, and brochures, these materials by themselves do not constitute social marketing. Rather, social marketing entails a comprehensive program in which these materials are employed as part of the tactics to reach a target audience. Social marketing emphasizes the importance of keeping the target audience and partners involved in needs assessment, message development, and refinement of messages and delivery strategies (Lefebvre and Flora, 1988; Andreasen, 1995). At the heart of the social marketing approach is an in-depth understanding of the consumer's wants and needs. Social marketing serves the organizing concept and provides analytic techniques for segmenting market audiences, product development, pricing testing and distribution. The social marketing sciences offer qualitative and quantitative research methods needed to understand consumer needs and behavior.

Cognizant Federal Agency

The appropriate cognizant Federal agency is generally the Federal agency that has been identified by OMB that is responsible for establishing indirect cost rates. For more information see item, A.2 Indirect Cost Rate in Appendix C.

<u>Organization</u>	<u>Cognizant Federal Agency</u>
State Public Assistance Agencies	Dept. of Health and Human Services
All Other State agencies	Federal agency identified by OMB
Educational Institution	Department of Education, Department of Defense-Naval Research, depending on which provided more Federal funds over the last 3 years
Nonprofit Organization	Normally the Federal agency with the largest dollar value of award with the organization

